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National Marine Electronics Association

December 1, 2003

Secretary, Federal Communications Commission
445 Twelfth Street SW, TW 325
Washington, DC 20554

RECEIVED

DEC 23 2003

Federal Communications Commission
Office of the Secretary

Comments regarding:
DA 03-3585
RM 10821

The National Marine Electronics Association (NMEA), is a trade and educational organization representing the interests of our 450 member businesses. Our membership is involved in the manufacture, sales and service of marine electronic equipment for commercial, recreational and defense vessels.

NMEA would like to support the petition of the National Telecommunication and Information Administration (RM10821) requesting FCC assistance in securing VHF Channels 87 and 88B for use for AIS. These channels are allocated internationally for AIS as approved by the International Maritime Safety Committee (IMO).

AIS is an essential safety tool for inter-ship navigation and collision avoidance and as such it is imperative that AIS transmissions be consistently broadcast on universally designated channels. The necessity to have standard interoperability is imperative for safety.

Of further concern is the request by MariTel that they be named exclusive Frequency Coordinator for AIS with the ability to impose initial registration fees as well as annual renewal fees on mandatory, non-mandatory and foreign SOLAS vessels and shore stations.

Those fees, if imposed, would most certainly discourage voluntary use of AIS, a system that performs only if all vessels participate. These fees would impose a further financial burden on owner/ operators of fishing and passenger vessels, many of whom have struggled to shoulder the financial burden of purchase and installation of AIS equipment.

We urge FCC support of the NTIA petition.

Sincerely,

Beth Kahr
President

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REFERENCE: Public Notice DA 03-3585
RM number. RM-10821

Office of the Secretary
Federal Communications Commission
445 12th St SW, TW-35
Washington, DC 20554

Dear Office of the Secretary:

On behalf of the 550,000 members of the Boat Owners Association of The United States (BoatU S.), we concur with and support the U S. Coast Guard's position on the Maritel, Inc., Petition for Rulemaking Regarding the Use of Maritime VHF Channels 87B and 88B (Nov. 7, 2003).

We are very concerned about the loss of the last available internationally-interoperable and recreational-vessel interoperable VHF spectrum in the United States. While it may appear that the issue of AIS is of a commercial vessel nature, all mariners — including recreational boaters — could be negatively affected if the petition succeeds. These VHF channels are essential to port security and maritime safety and allowing a third party to control of and profit from is not in the best interest of the government, its citizens, or mariners.

Thank you for the opportunity to comment.

Sincerely,

Michael G. Sciulla
Vice President, Government and Public Affairs
Boat Owners Association of The United States

CC: Qualex International, Inc., Portals II, 445 12th St., SW, Room CY-B402,
Washington DC 20554

Maria Ringold, FCC, Consumer and Governmental Affairs Bureau, Reference Information Center (RIC), 445 12th St. SW, Room CY-B529, Washington DC, 20554

Tim Maguire, FCC, Wireless Telecommunications Bureau, Public Safety and Private Wireless Division, 445 12th St. SW, Room 4-C342, Washington DC, 20554

Jeffrey Tobias, FCC, Wireless Telecommunications Bureau, Public Safety and Private Wireless Division, 445 12th St. SW, Room 4-C828, Washington DC, 20554